

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT OF DEFENDANTS'
MOTION TO STRIKE DECLARATIONS OF STACY FRIEDMAN
AND JOSH DAVIS SUBMITTED IN SUPPORT OF PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit A** is a true and correct copy of the Opening Expert Report of Stacy Friedman dated August 10, 2018.

3. Attached as **Exhibit B** is a true and correct copy of the Reply Expert Report of Stacy Friedman dated September 14, 2018 (exhibits omitted).

4. Attached as **Exhibit C** is a true and correct copy of the Declaration of Stacy Friedman in Support of Plaintiff's Motion for Partial Summary Judgment dated October 11, 2018.

5. Attached as **Exhibit D** is a true and correct copy of the Rebuttal Report of Robert Zeidman dated August 31, 2018 (exhibits omitted).

6. Attached as **Exhibit E** is a true and correct copy of the Rebuttal Report of Joseph Valandra dated August 31, 2018 (exhibits omitted).

7. Attached as **Exhibit F** is a true and correct copy of the Rebuttal Expert Report of W. Todd Schoettelkotte Relating to Damages dated August 31, 2018 (schedules and exhibits omitted).

8. Attached as **Exhibit G** is a true and correct copy of the Declaration of Josh Davis in Support of Plaintiff's Motion for Partial Summary Judgment dated October 10, 2018.

9. Attached as **Exhibit H** is a true and correct copy of VGT's Preliminary Witness List and Exhibit List dated February 16, 2018.

10. Attached as **Exhibit I** is a true and correct copy of VGT's Supplemental Preliminary Witness List and Exhibit List dated July 8, 2018.

11. Attached as **Exhibit J** is a true and correct copy of excerpts from the 30(b)(6) Deposition of Josh Davis dated August 3, 2018.

12. Attached as **Exhibit K** is a true and correct copy of Castle Hill Studios LLC's First Set of Interrogatories dated September 25, 2017.

13. Attached as **Exhibit L** is a true and correct copy of certain excerpts of Plaintiffs' Sixth Supplemental Objections and Responses to Castle Hill's First Set of Interrogatories dated August 3, 2018.

14. Attached as **Exhibit M** is a true and correct copy of correspondence from R. Gill to M. Sawyer dated April 9, 2018.

15. Attached as **Exhibit N** is a true and correct copy of correspondence from M. Sawyer to R. Gill dated March 22, 2018.

16. I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 16, 2018 in Washington, District of Columbia.

/s/ Robert C. Gill
Robert C. Gill

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018, I caused an unredacted copy of the foregoing Declaration to be served on the following counsel for Plaintiff who have consented to email service, via email:

Graydon Dean Luthey, Jr., OBA 5568
GABLE GOTWALS
1100 ONEOK Plaza
100 West Fifth Street
Tulsa, OK 74103-4217
(918) 595-4821
(918) 595-4990 facsimile
dluthey@gablelaw.com
Counsel for Video Gaming Technologies

Gary M. Rubman
Peter Swanson
Michael Sawyer
Rebecca B. Dalton
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, D.C. 20001-4956
(202) 662-6000
(202) 778-5465 facsimile
grubman@cov.com
pswanson@cov.com
msawyer@cov.com
rdalton@cov.com
Counsel for Video Gaming Technologies

Neil K. Roman
COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 841-1221
(212) 841-1010 facsimile
nroman@cov.com
Counsel for Video Gaming Technologies

/s/ Robert C. Gill
Robert C. Gill